

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

UNITED STATES OF AMERICA,	)	
	)	
v.	)	Case No. 7:19CR00004-002
	)	
JAMES MALCOLM HALE,	)	
	)	
<i>Defendant.</i>	)	

**MOTION FOR CONTINUANCE**

Defendant, James Malcolm Hale, by counsel, hereby moves this Court to continue the trial of this matter, and in support of this motion, states:

1. The jury trial of this matter is currently scheduled for March 25, 2019.
2. This is the first request for a continuance by the defense in this case.
3. Since being appointed, the undersigned has obtained the discovery materials, conferred with defendant, conferred with AUSA Bassford and engaged in plea negotiations. Additional time is needed to complete negotiations and prepare for trial if necessary. This continuance is warranted under 18 U.S.C. § 3161(h) to meet the ends of justice. Defendant agrees that the delay attributable to his request for this continuance shall be excluded in computing the time within which the trial must commence under the Speedy Trial Act.
4. The undersigned has advised AUSA Bassford that this motion is necessary, and the United States does not object to the request. If the Court grants this motion, counsel will confer about a new trial date and schedule this trial for a new, mutually agreeable date.

Wherefore, James Malcolm Hale, by counsel, hereby requests that the trial of his case be continued until such time as is agreeable to the Court and to Counsel for the parties.

Respectfully submitted,

JAMES MALCOLM HALE

By: /s/ Allegra M.C. Black  
Of Counsel

Allegra M.C. Black, Esq. (VSB No. 46188)  
Assistant Federal Public Defender  
Office of the Federal Public Defender  
210 First Street, S.W., Suite 400  
Roanoke, Virginia 24011  
(540) 777-0880 Telephone  
(540) 777-0890 Facsimile

*Counsel for Defendant James Malcolm Hale*

CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of March, 2019, I served the foregoing Motion for Continuance upon R. Andrew Bassford, Assistant United States Attorney, P.O. Box 1709, Roanoke, VA 24008-1709 by electronic filing, and I caused the original thereof to be filed electronically with Julia C. Dudley, Clerk, United States District Court, 210 Franklin Road, S.W. Roanoke, VA 24011.

By: /s/Allegra M.C. Black  
Allegra M.C. Black